

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| | | |
|-----------------------------------|---|-------------------------------|
| RENEE ZINSKY, |) | Civil Action No.: 2:22-cv-547 |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Electronically Filed |
| |) | |
| MICHAEL RUSSIN, RUSSIN |) | |
| FINANCIAL, RUSSIN GROUP, |) | |
| SIMON ARIAS, III, ARIAS AGENCIES, |) | |
| S.A. ARIAS HOLDINGS, LLC, |) | |
| AMERICAN INCOME LIFE |) | |
| INSURANCE COMPANY, |) | |
| |) | |
| Defendants. | | |

**DEFENDANT MICHAEL RUSSIN’S MOTION FOR
LEAVE TO SERVE ADDITIONAL INTERROGATORIES**

AND NOW, comes Defendant, Michael Russin, by and through his attorneys Benjamin D. Webb, Esquire and Cozza Law Group PLLC, and files the within Motion for Leave to Serve Additional Interrogatories, averring as follows:

1. On or about November 29, 2022, Defendant Russin served its first set of interrogatories directed to Plaintiff. A copy of Defendant Russin’s First Set of Interrogatories Directed to Plaintiff is attached hereto as Exhibit “A.”
2. Defendant’s First Set of Interrogatories contained 25 interrogatories.
3. On March 17, 2023, concurrent with the filing of this instant motion, Defendant served Defendant’s Second Set of Interrogatories. A copy of Plaintiff’s Second Set of Interrogatories is attached hereto as Exhibit “B.” These interrogatories were served so as to require a response prior to the close the extended fact discovery deadline, which is currently set for April 21, 2023.

4. Plaintiff's responses to Defendant's Second Set of Interrogatories, which was served via electronic mail, are due on or before April 16, 2023.

5. Defendant's Second Set of Interrogatories includes Interrogatories Nos. 26-33. These Interrogatories seek, *inter alia*, additional information regarding topics revealed via the publication of an Article by Insider, the basis for Plaintiff's Amended Motion to Extend Discovery Deadlines (ECF No. 55).

6. Defendant's counsel contacted Plaintiff's counsel to determine whether she would consent to Defendant's Motion for Leave to Serve Additional Interrogatories. Plaintiff's counsel has not responded.

WHEREFORE, Defendant, Michael Russin, respectfully requests that this Honorable Court enter the Order attached hereto, granting Defendant's Motion for Leave to Serve Additional Interrogatories.

Dated: March 17, 2023

Respectfully submitted

Cozza Law Group PLLC

s/Benjamin D. Webb
Benjamin D. Webb, Esquire
PA I.D. No. 328170
400 Holiday Drive, Suite 210
Pittsburgh, Pennsylvania 15220
(412) 294-8444
bwebb@cozzalaw.com
Counsel for Defendant Russin

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing Motion for Leave to Serve Additional Interrogatories has been sent via the CM/ECF system to all counsel and/or parties of record.

Cozza Law Group PLLC

/s/Benjamin D. Webb

Benjamin D. Webb, Esquire